



April 29, 2011

Steve Shipe
NWR Environmental Tribal Coordinator & Business Manager
Washington State Department of Transportation

Re: State Route (SR) 9 Pilchuck Creek Bridge Replacement Project

Dear Mr. Shipe:

As per a letter from Terry Drochak, the Historic Bridge Foundation (HBF) has been asked to comment on the alternatives analysis for the Pilchuck Creek Bridge Project. The letter, however, did not provide an alternatives analysis, but instead provided a simple listing of four alternatives currently being evaluated:

1. No Action
2. Build a new structure at a new location without affecting the historic integrity of the old bridge
3. Rehabilitate the historic bridge without affecting the historic integrity of the structure
4. Build a new structure at a different location and remove the old bridge

As a consulting party to the project, we believe detailed analysis must be made of these alternatives to the demolition of the Pilchuck Creek Bridge. All the alternatives raise issues about the purpose and need of the project. Alternative 2 raises questions about acquisition of ROW and the continued maintenance of the historic bridge. Alternative 4 raises the question of why the historic bridge would need to be removed. In addition, we believe this list must be reviewed and discussed by all consulting parties to see if additional alternatives might be developed for evaluation.

The Historic Inventory Report provided to us notes the 1916 bridge is a filled spandrel-arch bridge derived from a Daniel Luten design. The report also notes that while Luten bridges were once common in the early 20th century, their presence is rapidly declining due to deterioration and replacement. The Pilchuck bridge is described not only as an example of a Luten bridge that maintains "better than average integrity," it is a much rarer example of a Luten bridge because it is a double-span example. From our own research, we have learned the Pilchuck Bridge is the oldest bridge on the state highway system.

Therefore, we believe alternatives to demolition must be fully developed in consultation with all consulting parties before the HBF can provide comments about the alternatives. Once a meeting with WSDOT staff and consulting parties is held, we believe substantive comments can be provided.

As a final comment, we note this project is being presented as a replacement project. We are concerned with this representation as it suggests that WSDOT has reached a determination as to the fate of the Pilchuck Bridge. Section 106 review requires agencies to consider the effects of projects on historic properties and while it does not mandate preservation, the review works to ensure preservation values are factored into decisions.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Kitty Henderson".

Kitty Henderson
Executive Director